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UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]
ORDER REGARDING ECF 3569**

This Document Relates to:

B.L. v. Uber Technologies, Inc. et al.,
3:24-cv-7940

Judge: Hon. Lisa J. Cisneros
Courtroom: Courtroom G – 15th Floor

1 **RECITALS**

2
3 **WHEREAS**, pursuant to the Court's July 24, 2025 Order (ECF 3569), on July 25, 2025,
4 Plaintiff served 10 questions regarding certain document production issues and on July 29, 2025
5 Defendants provided responses to such questions, agreeing to tender two 30(b)(6) witnesses and
6 provide a declaration; and

7 **WHEREAS**, the parties have been meeting-and-conferring regarding Defendants'
8 responses, including the timing of document productions that Plaintiff believes are necessary to
9 conduct such depositions, the scheduling of the two depositions, how certain questions will be
10 addressed at the two depositions, and timing for Defendants to provide the declaration.
11

12 **STIPULATION**

13 **NOW, THEREFORE**, the parties hereby agree and request the Court enter the parties'
14 stipulation as follows:

- 15 1. Defendants will serve by August 1, 2025 amended responses to question nos. 2 and 3
16 clarifying the witnesses who will testify regarding different issues within those
17 questions;
18
19 2. Defendants will serve by August 1, 2025 the declaration identified in their response to
20 question no. 10;
21
22 3. Defendants will comply with ECF 3615 in connection with the 30(b)(6) deposition of
23 Jamie Brown (question no. 1 and portions of question nos. 2 and 3), scheduled for
24 August 6;
25
26 4. Defendants will comply with ECF 3615 in connection with the 30(b)(6) deposition of
27 Hannah Nilles (portions of question nos. 2 and 3 and question nos. 4-9), scheduled for
28 August 7, 2025.

IT IS SO STIPULATED.

1 Dated: July 31, 2025

Respectfully submitted,

2 By: /s/ Laura Vartain Horn
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25 RASIER, LLC, and RASIER-CA, LLC

26 Dated: July 31, 2025

Respectfully submitted,

27 By: /s/ Roopal P. Luhana
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Co-Lead Counsel for Plaintiffs

ATTESTATION

Under Civil Local Rule 5-1(h)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 31, 2025

By: /s/ Laura Vartain Horn

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. LISA J. CISNEROS
United States Magistrate Judge